

EXHIBIT J [Doc. 1-17]
(Unredacted Exhibit to Complaint)

Stephen Kabakoff

From: Kirk Grundahl <kgrundahl@qualtim.com>
Sent: Wednesday, May 29, 2024 5:53 AM
To: Stephen Kabakoff
Cc: Deloris Lanus; Suzi Grundahl; Jill Zimmerman; Keith Hershey
Subject: RE: Paragon Component Systems, LLC - Requested Response from Qualtim and Inspired Pursuits

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Kabakoff,
One update to this email, which I briefly did not think of, is that Paragon uses Slack and Trello and likely a variety of internal and external communication vehicles that I am not intimately aware of, so I should have said preserve all communication vehicles. I am most familiar with the Google Meet recordings, so that was top of mind.
Thank you again.
Kirk
608-217-3713

From: Kirk Grundahl
Sent: Wednesday, May 29, 2024 4:44 AM
To: stephen.kabakoff@millermartin.com
Cc: Deloris Lanus <Deloris.Lanus@millermartin.com>; Suzi Grundahl <sgrundahl@qualtim.com>; Jill Zimmerman <jzimmerman@qualtim.com>; Keith Hershey <khershey@qualtim.com>
Subject: RE: Paragon Component Systems, LLC - Requested Response from Qualtim and Inspired Pursuits

Mr. Kabakoff,
As requested below, please find attached our response along with the following:

1. Exhibits 1 to 3 provide a bit of background information that may be useful.
2. Exhibit 4 is a letter that was drafted for us to sign and send back to you, which will not be.
3. Exhibit 5 is your letter to us just to have everything in one place.

Please direct Paragon to preserve all video and audio recordings (i.e. google meet, etc.) and all email of all interactions with Qualtim, DrJ, CBI and Inspired Pursuits, LLC (IP-LLC) that they have, as deleting anything at this point despoils direct evidence.
If there are any questions please call.
Please also note that nothing contained in this email or attachments, nor any act or omission to act by IP-LLC and/or Qualtim, is intended or should be deemed a waiver or modification of any rights or remedies that IP-LLC and/or Qualtim may have at law or in equity, and all such rights are expressly reserved.
Thank you.
Kirk
608-217-3713

From: Deloris Lanus <Deloris.Lanus@millermartin.com>
Sent: Thursday, May 23, 2024 2:30 PM
To: Kirk Grundahl <kgrundahl@qualtim.com>
Subject: Paragon Component Systems, LLC

SENT ON BEHALF OF STEPHEN KABAKOFF

Attached please find correspondence regarding the above-referenced company. If you have any questions, please feel free to contact Stephen Kabakoff at (404) 962-6494 or Stephen.Kabakoff@millermartin.com.

We look forward to hearing from you.

Deloris Lanus



Assistant to Joe All, Stephen Kabakoff, John David Lind, Cory McKenna, Pharan Evans and Charles Forlidas

d (404) 962-6130

f (404) 962-6300

Suite 2100 | 1180 W Peachtree Street, NW | Atlanta, GA 30309



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